

EXHIBIT B

(Part 8 of 10)

18. Please provide all documents illustrating, describing or otherwise relating to the Muwafaq Foundation's formation and organizational structure, the date of incorporation, the state of incorporation, the duration of its existence, any documents relating to its initial capitalization and subsequent funding, and/or any other writing relating to the creation or purpose of the Muwafaq Foundation (including any subsidiary, affiliate, or branch office).

ANSWER:

19. From the period beginning January 1990 through the present, please provide any and all documents relating to Your role in the establishment, organization, funding, oversight, supervision, management, and/or control of the Muwafaq Foundation, including without limitation, appointment and termination of personnel, accounting, banking and financial transactions, fundraising, and actual distribution of financial and non-monetary support to charitable designees.

ANSWER:

20. From the period beginning January 1990 through the present, please provide any and all documents relating to Your supervision, management, control of, or distribution of the

Muwafaq Foundation's funds, including without limitation, any and all documents relating to Your duties and responsibilities to determine and/or make recommendations as to which charities, individuals, or entities should receive financial and/or non-monetary support from the Muwafaq Foundation and the purpose for such disbursements.

ANSWER:

21. Please provide all documents relating to the administration, governance, and long-term strategic decision-making of the Muwafaq Foundation (including any subsidiary, affiliate, or branch office), including but not limited to, articles of incorporation, by-laws, corporate charters, mission statements, constitutions, documents relating to the duties and powers of any boards and/or committees, statements of purpose, and/or any other related writing.

ANSWER:

22. From the period beginning January 1990 through the present, please provide any and all documents relating to the establishment, duties, obligations, objectives, membership, composition and/or authority of any committees, boards and/or internal bodies of the Muwafaq Foundation.

ANSWER:

23. From the period beginning January 1990 through the present, please provide all documents identifying each officer, director, trustee, shareholder, board member, and/or committee member of the Muwafaq Foundation (including any subsidiary, affiliate, or branch office).

ANSWER:

24. From the period beginning January 1990 through the present, please provide all documents relating to any meetings of officers, directors, trustees, shareholders, managers, boards, committees, and/or internal bodies of the Muwafaq Foundation, including without limitation, any agendas or meeting minutes.

ANSWER:

25. From the period beginning January 1990 through the present, please provide statements for any and all banking and financial accounts held by the Muwafaq Foundation.

ANSWER:

26. From the period beginning January 1990 through the present, please provide all documents relating to any and all accounts the Muwafaq Foundation holds or has held at NCB.

ANSWER:

27. From the period beginning January 1990 through the present, please provide all documents relating to any and all transfers from NCB accounts to the Muwafaq Foundation.

ANSWER:

28. From the period beginning January 1990 through the present, please provide all documents relating to any accounts in any banking or financial institution You hold or held jointly with, or on behalf of the Muwafaq Foundation, and/or any Muwafaq Foundation accounts over which You hold or have held signatory authority.

ANSWER:

29. Please provide any and all documents relating, in whole or in part, to any audit, due diligence, analysis, examination, survey, or review of the Muwafaq Foundation's financial accounts, investments, assets, capital, and/or financial affairs, conducted either by the employees of the Muwafaq Foundation, NCB and/or NCB's Audit, Zakat and Shariah Committees, or any third party, including but not limited to, any bank, financial institution, government agency, accountant, or auditor. Such documents shall include any audit, due diligence, analysis,

examination, survey, or review ordered, conducted, supervised, overseen, or reviewed by the Kingdom of Saudi Arabia and/or the Saudi Arabian Monetary Agency (“SAMA”).

ANSWER:

30. From the period beginning January 1990 through the present, please provide all documents relating to any investigation, inquiry, review, audit, due diligence or analysis conducted by United States Investigator, any Foreign Investigator, and/or any Saudi Investigator, which references or addresses any of the Muwafaq Foundation’s banking and financial accounts, including any accounts held at NCB.

ANSWER:

31. From the period beginning January 1990 through the present, please provide all documents relating to any transactions, financial or otherwise, between You and the Muwafaq Foundation.

ANSWER:

32. From the period beginning January 1990 through the present, please provide all documents relating to the transfer of funds from any of Your accounts to the Muwafaq Foundation. Such accounts shall include, but are not limited to, any banking and financial accounts You hold or have held at NCB (i.e., personal account, business account, or otherwise),

any NCB accounts in which You hold or have held a beneficial interest, and/or any NCB accounts over which You hold or have held signatory authority.

ANSWER:

33. From the period beginning January 1990 through the present, please provide all documents relating to any investigation, inquiry, review, audit, due diligence or analysis conducted by any United States Investigator, any Foreign Investigator, and/or any Saudi Investigator, which reference or address any alleged improprieties relating to the transfer of funds from any of Your accounts identified in Requests # 31-32 above.

ANSWER:

34. From the period beginning January 1990 through the present, please provide any and all documents governing, describing, detailing, or otherwise relating to the relationship between the Muwafaq Foundation and NCB and/or any NCB personnel.

ANSWER:

35. From the period beginning January 1990 through the present, please provide any and all documents relating to the role of NCB and/or any NCB personnel in the establishment, organization, funding, oversight, supervision, management, and/or control of the Muwafaq Foundation, including without limitation, appointment and termination of personnel, accounting,

banking and financial transactions, fundraising, and actual distribution of financial and non-monetary support to charitable designees.

ANSWER:

36. From the period beginning January 1990 through the present, please provide any and all documents the Muwafaq Foundation sent to, and/or received from, NCB and/or any NCB Personnel, including without limitation, all documents relating to the transfer of NCB funds to the Muwafaq Foundation, and vice versa.

ANSWER:

37. From the period beginning January 1990 through the present, please provide any and all documents relating to any contributions by NCB and/or any NCB personnel to the Muwafaq Foundation, including but not limited to, monetary donations (including any monetary donations of funds originating from *haram* investments or activities), *zakat*, gifts, grants, and/or other charitable contributions. If the contribution was made by wire transfer, please provide records identifying the name of the individual who sent the money, the bank from which the money was sent, the wire transfer number, the recipient of the funds, the bank which received the wire transfer and the bank account numbers of the sender and receiver.

ANSWER:

38. From the period beginning January 1990 through the present, please provide any and all documents relating to any form of non-monetary support or contribution provided by NCB and/or any NCB Personnel to the Muwafaq Foundation, including but not limited to, any administrative assistance, any assistance in obtaining identification and credentials to facilitate international travel, and any physical and logistical assets.

ANSWER:

39. From the period beginning January 1990 through the present, please provide all documents relating to any investigation, inquiry, review, audit, due diligence or analysis conducted by any United States Investigator, any Foreign Investigator, and/or any Saudi Investigator, which references or addresses any relationship between the Muwafaq Foundation and NCB and/or any NCB personnel, including without limitation, any investigation relating to financial transactions between the Muwafaq Foundation and NCB and/or any NCB personnel.

ANSWER:

40. Please provide all documents relating to any and all information or notification You and/or the Muwafaq Foundation received prior to September 11, 2001 that any individual or entity employed by and/or affiliated with the Muwafaq Foundation was associated with or involved in: (i) the sponsorship of any radical, extremist, or terrorist organization; (ii) criminal, corrupt or deviant activities; or (iii) any military, radical or terrorist activity, plot, or attack.

ANSWER:

41. Please provide all documents relating to any and all information or notification You and/or the Muwafaq Foundation received prior to September 11, 2001 that any individual or entity employed by and/or affiliated with the Muwafaq Foundation may have been or was engaging in conduct unrelated to the Foundation's ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to: (i) Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations, regardless of whether you believe such person(s) or entity(s) was acting within the scope of his employment in relation to any such activities.

ANSWER:

42. Please provide all documents relating to any and all information or notification You and/or the Muwafaq Foundation received prior to September 11, 2001 that any individual or entity employed by and/or affiliated with the Muwafaq Foundation was associated with or involved in: (i) providing funds, services, assets, medical assistance or any other form of support to mujihadeen in any part of the World; or (ii) providing financial, logistical, religious, political or any other form of assistance in relation to any armed jihad, regardless of whether such jihad was declared legitimate by competent religious authorities.

ANSWER:

43. Please provide any and all documents relating to the Islamic Republic of Pakistan's investigation and 1995 raid of the Muwafaq Foundation's Islamabad office and arrest of the local Muwafaq Foundation director, including without limitation, all documents relating to the subsequent closure of that office.

ANSWER:

44. Please provide any and all documents relating to the Federal Democratic Republic of Ethiopia's investigation and determination to close the Muwafaq Foundation's Ethiopia office in or around 1995.

ANSWER:

45. Please provide any and all documents relating to the Kingdom of Saudi Arabia's request that the Muwafaq Foundation cease operations, including without limitation, any documents relating to any related investigation.

ANSWER:

46. From the period beginning January 1990 through the present, please provide any and all documents You and/or the Muwafaq Foundation sent to, and/or received from, the Kingdom of Saudi Arabia, relating to any accusation that the Muwafaq Foundation, including any individual or entity employed by and/or affiliated with the Muwafaq Foundation, was associated with or involved in any criminal, corrupt, deviant, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

47. From the period beginning January 1990 through the present, please provide any and all documents relating to any internal investigation conducted by You and/or the Muwafaq Foundation, relating to any accusation that the Muwafaq Foundation, including any individual or entity employed by and/or affiliated with the Muwafaq Foundation, was associated with or involved in any criminal, corrupt, deviant, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

48. Please provide any and all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any individual or entity employed by and/or affiliated with the Muwafaq Foundation as a result of financial irregularities, suspicious

activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad, including without limitation, any such individuals or entities identified in response to Requests # 39-47 above.

ANSWER:

49. Please provide any and all documents relating to the disposition of all of the Muwafaq Foundation's accounts and assets held at any banking or financial institution, including NCB, following the Muwafaq Foundation's closure in or around 1996 or later.

ANSWER:

50. From the period beginning January 1990 through the present, please provide any and all documents relating to any business, employment, financial, charitable, religious or other relationship between You and Yassin al Kadi.

ANSWER:

51. From the period beginning January 1990 through the present, please provide any and all documents relating to any business, employment, financial, charitable, religious or other relationship between NCB and Yassin al Kadi.

ANSWER:

52. From the period beginning January 1990 through the present, please provide any and all documents relating to Yassin al Kadi's role in establishing and implementing an Islamic banking division within NCB, including without limitation, all documents relating to al Kadi's role in developing Islamic banking products for NCB, and the design and implementation of training programs for NCB.

ANSWER:

53. From the period beginning January 1990 through the present, please provide any and all documents governing, describing, detailing, or otherwise relating to the relationship between NCB and the National Management Consultancy Center ("NMCC").

ANSWER:

54. From the period beginning January 1990 through the present, please provide any and all documents relating to any business, employment, financial, charitable, religious or other relationship between You and Chafiq Ayadi Muhammad.

ANSWER:

55. From the period beginning January 1990 through the present, please provide any and all documents relating to any business, employment, financial, charitable, religious or other relationship between You and Wael Hamza Jelaidan.

ANSWER:

Dated: August 8, 2008

Respectfully submitted,

COZEN O'CONNOR

By: 

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the *Federal Insurance* Plaintiffs' First Set of Jurisdictional Requests for Production of Documents Directed to Khalid bin Mahfouz was served via electronic mail and U.S. first-class mail, postage prepaid, this 8th day of August 2008, upon:

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(Defendants' Executive Committee's appointed representative to receive discovery requests and responses in 03-MDL-1570)



J. Scott Tarbutton, Esq.